
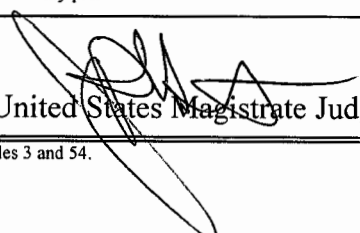


CRIMINAL COMPLAINT

United States District Court		DISTRICT Eastern District of Pennsylvania	
UNITED STATES OF AMERICA		DOCKET NO.	
v.		MAGISTRATE'S CASE NO.	
CHRISTOPHER STEIBING		14-62M	
Complaint for violation of Title 18 United States Code § 2422(b).			
NAME OF JUDGE OR MAGISTRATE Honorable Jacob P. Hart		OFFICIAL TITLE U.S. Magistrate Judge	LOCATION Philadelphia, PA
DATE OF OFFENSE September 14, 2009 through August 1, 2012	PLACE OF OFFENSE Morrisville, Pennsylvania and New Jersey	ADDRESS OF ACCUSED (if known) 86 Kyle Way Ewing, NJ	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: From at least September 14, 2009 through at least August 1, 2012, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant Christopher Steibing used a facility and means of interstate and foreign commerce, that is the Internet, to knowingly persuade, induce, entice, or coerce an individual who had not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, and to attempt to do so, in violation of Title 18 United States Code 2422(b).			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: SEE AFFIDAVIT ATTACHED HERETO.			
MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED:			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT (official title) Michael R. Goodhue 	
		OFFICIAL TITLE Special Agent, Federal Bureau of Investigation	
Sworn to before me and subscribed in my presence.			
SIGNATURE OF MAGISTRATE ⁽¹⁾ Honorable Jacob P. Hart, United States Magistrate Judge 		DATE 1-16-14	

1) See Federal Rules of Criminal Procedure rules 3 and 54.

14-62M

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, Michael R. Goodhue, a Special Agent with the Federal Bureau of Investigation, Philadelphia, Pennsylvania, being duly sworn, depose and state as follows:

A. BACKGROUND

1. I am employed as a Special Agent of the Federal Bureau of Investigation (FBI) in Philadelphia, Pennsylvania. I have been employed as a Special Agent since September 2008. I am presently assigned to the Philadelphia Division's Crimes Against Children squad, which investigates sex trafficking of children and prostitution investigations, child pornography, and kidnappings, among other violations of federal law. I have gained experience through training at the FBI Academy, various conferences involving crimes against children, and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. This affidavit is submitted in support of an arrest warrant for CHRISTOPHER STEIBING, for coercion and enticement of a minor, in violation of Title 18, United States Code Section 2422(b). The following affidavit is based upon my review of evidence obtained during a search warrant executed by the Falls Township Police Department and analyzed by the Philadelphia Regional Computer Forensics Lab, as well as, interviews of witnesses and other law enforcement personnel. The statements in this Affidavit are based in part on information received personally during my investigation of this matter, as well as information obtained by other law enforcement personnel. Since this Affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me

concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to arrest CHRISTOPHER STEIBING in connection with his crimes against Confidential Witness # 1 (“CW1”), the daughter of a woman who dated Christopher Steibing when CW1 was approximately 11 years old.

B. RELEVANT STATUTES

4. Title 18, United States Code, Section 2422(b) (coercion and enticement of a minor) prohibits any person from using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so.

5. Title 18, United States Code, Section 2251 (production of child pornography), makes it a crime to employ, use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, if such persons knows that the visual depiction will be transmitted using a facility of interstate commerce, if that visual depiction was produced using materials that have been transported in or affecting interstate or foreign commerce, or if the visual depiction was actually transmitted using a means or facility of interstate commerce.

6. Title 18, United States Code, Section 2261A(2) (stalking) prohibits a person from intending to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, using the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or

any other facility of interstate or foreign commerce to engage in a course of conduct that places that person in reasonable fear of the death of or serious bodily injury to that person, a member of the immediate family of that person or a spouse or intimate partner of that person or causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to that person or those parties defined above.

7. Title 18, United States Code, Section 2256, defines “sexually explicit conduct” to include the “lascivious exhibition of the genitals or pubic area of any person.” The Internet is a facility of interstate commerce.

C. FACTS ESTABLISHING PROBABLE CAUSE

8. Through my investigation, I have learned that starting no later than September 2009, when CW1 was no older than 14 years old, Christopher Steibing repeatedly used the Internet to 1)persuade and induce CW1 to engage in illegal sexual activity, 2)cause CW1 to produce and transmit to him via the Internet, visual depictions of herself engaged in sexually explicit conduct and 3)with the intent to harass or cause substantial emotional distress to CW1 or her family, engage in a course of conduct that would be reasonably expected to cause substantial emotional distress to CW1 or her family. Steibing’s use of the Internet resulted in the creation of child pornography, which Steibing obtained and kept until his computer was seized by law enforcement on May 1, 2012.

Overview of Digital Evidence

9. In March 2012, the Falls Township Police Department in Bucks County, Pennsylvania began an investigation into Christopher Steibing and his use of the Internet in order to create and obtain child pornography. As part of the investigation, Falls Township Detective

Stephen Reeves received information indicating that Steibing was using online aliases such as “NEWJERSEYSTONER” and “IAMCSKILLZ” in order to obtain images of CW1 in different stages of partial nudity, which Steibing had stored on a Dell laptop computer that he kept on his person at all times. Detective Reeves learned that since at least 2009, Steibing had resided alternately in Bucks County and New Jersey, and that he spent significant time in both. After determining that Steibing had transported the Dell laptop from Bucks County to a residence at 86 Kyle Way, Ewing, New Jersey, Detective Reeves coordinated with law enforcement in Ewing in order to obtain a search warrant.

10. On May 1, 2012, Judge Robert Billmeier of Superior Court of Mercer County, New Jersey approved and issued a search warrant for 86 Kyle Way, Ewing, New Jersey which authorized the recovery of evidence of child pornography including a Dell laptop computer and external hard drives. That same day, Detective Reeves and members of the Ewing Township Police department executed the search warrant at 86 Kyle Way, Ewing, New Jersey, where Steibing was located inside the residence. Steibing confirmed that he was the owner of a Dell Latitude laptop, model D630, bearing serial number BB2JGF1 (which included an internal 80 Gigabyte Hitachi hard drive, bearing serial number 11S39T2776Z1ZCWE001DLR) (hereinafter “the Dell Laptop”) which was found on the living room floor. Steibing also acknowledged that he was the owner of a Seagate external hard drive and an Apple iPod Touch, bearing serial number 9C908PYS208 (hereinafter “the iPod Touch”), both of which were found in his bedroom. Detective Reeves seized all of these items. Detective Reeves prepared and obtained a search warrant requesting permission to search all of these seized items, which was approved by the Bucks County, Pennsylvania, District Attorney’s office.

11. On June 27, 2012, the search warrant was approved by Bucks County District Court Judge Jan Vislosky. On June 28, 2012, Detective Reeves took the seized items to the FBI's Philadelphia Regional Computer Forensics Laboratory in Radnor, Pennsylvania for forensic examination.

12. On August 26, 2013, your affiant obtained a copy of the forensic examination of evidence including the Dell laptop computer and the iPod Touch performed by the Philadelphia Regional Forensics Laboratory. These items contain numerous images, emails and instant messaging chat sessions which appear to be from the messenger service provided by America Online (AOL). Among the images on the Dell Laptop were hundreds of images of CW1, including numerous images of her in various stages of nudity. Among the images on the iPod Touch were hundreds of images of CW1, including numerous images of her in various stages of nudity. Based on my review of these images, and my training and experience, more than a dozen of these images of CW1 are child pornography as defined in Title 18, United States Code, Section 2256, including some that are sadistic in nature, as that term has been defined by federal courts. All of these images of child pornography travelled over the internet, in interstate commerce, prior to the seizure of the Dell Laptop.

13. During review of the forensic results from the Dell Laptop, your affiant discovered an AOL chat session between "NEWJERSEYSTONER" and "CUTTEGIRL2857" dated September 14, 2009. Based on facts learned in this investigation, I have learned that CUTTEGIRL2857 was the AOL screen name that CW1 used at that time and I believe that NEWJERSEYSTONER was an AOL screen name used by Steibing. CW1 was 14 years old at the time of this chat session. During this session, NEWJERSEYSTONER transmits images

approximately nine times with the user CUTTEGIRL2857. During this lengthy chat session, NEWJERSEYSTONER is clearly trying to persuade and entice CUTTEGIRL2857 to send numerous photographs and videos of herself to him. NEWJERSEYSTONER also indicates to CUTTEGIRL2857 that he is 16 years old. In reality, Steibing was 28 years old at this time. An excerpt from this conversation, which I believe illustrates Steibing persuading CW1 to send him photos of herself wearing underwear, is as follows:

NEWJERSEYSTONER: "Well I don't want to be nasty.. so it would b up 2 u.. but id love a lil strip tease.. u don't gotta get naked or nething.. maybe just 2 ur undies n bra.. THAT WOULD B HOTT =) ... lol"

CUTTEGIRL2857: "lolz k"

NEWJERSEYSTONER: "4 real? Wow.. you're the best.. I love you!"

14. Your affiant also discovered in the Dell Laptop another AOL chat session between "NEWJERSEYSTONER" and "CUTTEGIRL2857" dated September 21, 2009. CW1 was 14 years old at the time of this chat session. During this session, "NEWJERSEYSTONER" persistently asks to see more revealing pictures of "CUTTEGIRL2857" throughout the conversation. "CUTTEGIRL2857" informs him that she took the pictures from her phone and sent them to him. An excerpt from this conversation, which I believe illustrates Steibing persuading CW1 to send him pictures of her genitalia, is as follows:

CUTTEGIRL2857: "cani hav apic now pretty plz bby"

NEWJERSEYSTONER: "I'm lookin"

NEWJERSEYSTONER: "I dunno if I got ne new ones.."

NEWJERSEYSTONER: "u still owe me 2! Your butt and your pussy! *smiles*"

CUTTEGIRL2857: "I wan u 2 see tht in person 1st"

NEWJERSEYSTONER: "I do 2, but I showed u mine, u could show me urs, please baby!"

CUTTEGIRL2857: "I showd u my boob"

NEWJERSEYSTONER: "I know.. but I really wanna see ur pretty lil ass and that hot lil pussy baby, please 4 mee....."

15. Your affiant discovered a series of approximately nine images on the Dell

Laptop that have date stamps of September 21, 2009, the date of the AOL chat session described above. These images depict a girl in various stages of undress and were sent to the email address NEWJERSEYSTONER@aol.com, as a multimedia message (MMS) from the telephone number 609-[REDACTED]-0573. One of these images, an example of child pornography, depicts a clear view of the girl's exposed genitals with a hand simulating masturbation on herself. As explained below, I have learned that CW1 was the girl in these images and that 609-[REDACTED]--0573 was her mobile telephone number in September 2009.

16. Your affiant also reviewed discovered numerous AOL screen names and contact lists for these screen names that were used on the Dell Laptop. The screen names present included "NEWJERSEYSTONER," "MRCSKILLZ3," "LEIGHVEGAS0237," and "MAMALICKABODE." The contact address book for "NEWJERSEYSTONER" contained the contact telephone number and MMS contact for CW1 of 609-[REDACTED]-0573@mms.att.net and her screen name of "CUTTEGIRL2857," all of which indicates communication with CW1.

17. On August 16, 2012, Detective Reaves discovered that clothed and nude images of both CW1 and her mother – most of which were also found on the Dell Laptop and/or the iPod Touch – had been uploaded to the Internet site swapsmut.com by someone using a username that was found on the Dell Laptop under the "buddy list" for LEIGHVEGAS0237

The minor victim

18. On July 24, 2012, Detective Reeves interviewed CW1 at her residence. A summary of certain portions of that interview follows.

19. CW1 has used AOL Messenger since she was in the 4th grade, using the screen name "CUTTIEGIRL2857" since that time. CW1 stopped using AOL because she was being

“harassed by him.” CW1 was referring to her mother’s ex-boyfriend, Christopher Steibing. CW1 met Christopher Steibing when she was approximately 11 years old, when he began to date her mother, CW2. CW1 recalled a time when Steibing walked in on CW1 while she was using the bathroom and she was partially nude. Steibing did not say anything and walked out. Shortly after CW2 ended the relationship with Steibing, CW1 started receiving messages on AOL from a screen name of “AMANDAFOX93”. “AMANDAFOX93” said that she was a 15 year old female who was moving near her and going to school with her. CW1 spoke with this person several times a week for several weeks, when she was approximately 13 years old. During their conversations, “AMANDAFOX93” would try to engage CW1 with “sexual talk”. This unknown person would also tell CW1 about “having sex with people” and asked CW1 if she “was doing anything sexual.” “AMANDAFOX93” also revealed that she was “dating” Steibing. CW1 then contacted Steibing’s mother and asked her to tell Steibing to stop contacting her. Approximately thirty minutes later, “AMANDAFOX93” contacted her online and asked “What? Going to tell his Mommy?” CW1 attempted to talk with this person on the telephone but never succeeded because “AMANDAFOX93” always had an excuse.” CW1 never met “AMANDAFOX93” in person.

20. During the same time period mentioned above, an unknown person known as “NEWJERSEYSTONER” was also messaging CW1 on AOL. “AMANDAFOX93” told CW1 that “NEWJERSEYSTONER” was her friend and that CW1 should talk to him. “NEWJERSEYSTONER” claimed that he was a 14 year old boy named “Cory” who was taking care of his sick mother. “NEWJERSEYSTONER” sent CW1 several images that purported to be pictures of himself and asked CW1 to send him pictures of her.

21. At first, CW1 sent him pictures of herself with clothing on. The photographs

eventually became more revealing, and CW1 sent pictures of her nude chest.

NEWJERSEYSTONER” sent CW1 several pictures of a penis that was purportedly his. CW1 also admitted to sending him pictures of “other parts of her body.” “NEWJERSEYSTONER” sent several pictures back to her of him ejaculating on CW1’s pictures. CW1 stated that “NEWJERSEYSTONER” was very friendly to her at first, but became more aggressive. “NEWJERSEYSTONER” would get mad if CW1 did not send any nude photographs of herself to him.

22. CW1 did send nude photographs of herself, as well as her phone number and home address, to “NEWJERSEYSTONER,” whom she then believed she was dating in an online relationship. “NEWJERSEYSTONER” called her approximately three times on the telephone. During one of the phone conversations, “NEWJERSEYSTONER” tried to get CW1 to masturbate and told her that he was masturbating.

23. CW1 believed “NEWJERSEYSTONER” had a very deep voice for a 14 year old and she once called him a “pedophile,” which caused him to get mad. CW1 eventually stopped talking to “NEWJERSEYSTONER” because he was becoming “annoying” and he continued to ask for nude photographs of herself. “NEWJERSEYSTONER” told CW1 that CW1 would be arrested by police if she admitted to having sent nude photographs (and CW1 was hesitant to inform Detective Reeves that she had e-mailed nude photographs of herself for this reason). CW1 later received a message from “AMANDAFOX93” telling her that “NEWJERSEYSTONER” tried to hang himself because CW1 was not speaking to him and urging CW1 to talk to him again. CW1 believes that Steibing tried to contact her under several other screen names, including “MAMALICKABODE”. CW1 recognized the typing and writing style

of these online personas.

24. Having eventually concluded that Steibing was the identity of the person contacting her through various screen names, CW1 stated that Steibing's efforts to obtain images of her spanned multiple years. Detective Reeves showed CW1 several photographs that had been recovered from the Dell Laptop. CW1 identified several photographs of herself that she recognized as being between the ages of 13 and 17 years old. CW1 was visibly embarrassed when confronted with the explicit sexual images of herself, and did not identify those particular images even though it was obvious to Detective Reeves and your affiant that these photographs are of CW1. For example, there is a photograph that CW1 identified as herself at the age of 14, holding a blue colored hair brush inserted in her mouth while she bares her breast. In the next photograph in the series, which CW1 did not identify, the same hair brush was inserted in CW1's vagina.

25. On August 1, 2012, CW1 contacted Detective Reeves to advise him that she had just received a "friend" request on Facebook from an unknown person who was using a variation of CW1's own name. This unknown person claimed that "she" was adding family members as Facebook friends. CW1 did not know this person, but noticed that this person had several Facebook friends who were friends of CW1's.¹ CW1 sent this person a message asking if she knew her. On the iPod touch, Reeves had found, among other things, a Facebook application and various e-mail accounts, including librabmvv@aol.com. In reviewing messages for the librabmvv@aol.com account, Reeves observed an e-mail, dated August 1, 2012, notifying the user that the user's Facebook account had received a message from CW1 asking "do I know you."

¹ Detective Reeves reviewed several AOL Messaging conversations found on the Dell Laptop, in which the user, believed to be Steibing, engaged in sexually explicit conversations with others while portraying himself as a teenage girl who has had sexual intercourse with her mother's ex-boyfriend. One such conversation between "NEWJERSEYSTONER" and a user believed to be a peer of CW1's indicated to Reeves that Steibing was actively attempting to befriend teenage females who knew CW1.

The minor victim's mother

26. On July 24, 2012, Detective Reeves interviewed "CW2," the mother of CW1. A summary of certain portions of that interview follows.

27. CW2 met Christopher Steibing in October of 2005 through AOL messaging and eventually met him in person in Trenton, New Jersey. CW2 and Steibing dated for approximately six or seven months and then the relationship ended. CW2 recalled that Steibing had several AOL screen names to include "CSKILLZ", "IAMCSKILLZ", "MRCSKILLZ" and "AMANDAFOX". CW2 verified that CW1 used the AOL screen name "CUTTEGIRL2857". CW2 stated that in approximately 2009 or 2010, CW1 told CW2 that she was having problems because someone on AOL "made her take pictures of herself" and "they know where we live. They are going to kill us." CW1 had to drop out of high school and get her GED because of these problems. After dropping out of high school and moving away from her hometown, CW1 was continually harassed by an unknown person who continued to open up email accounts using variations of CW1's name. The unknown person continued to send nude photographs of CW1 to CW1. The unknown person demanded more nude pictures of CW1. The unknown person also threatened to kill CW1's family if CW1 did not comply. The unknown person also threatened to send nude photographs of CW1 to CW1's family members if CW1 did not provide more nude photographs. CW2 stated that several members of CW2's family received an email or text message from an email account opened under one of the variations of CW1's name. The email and/or text messages included a picture of CW1, nude with the word "whore" written on her exposed chest.

28. On December 10, 2013, your affiant contacted CW2 and was asked if she recognized the telephone number 609-[REDACTED]--0573. CW2 recognized this as her

daughter's old cell phone number, which had been active back in 2009 but had since been turned off.

Steibing's Arrest


29. On May 1, 2013, having received information on Steibing's whereabouts from the Marion County Sheriff's Department in Florida, Detective Reeves located Steibing mowing the front lawn of 107 Delaware Avenue in Morrisville, Bucks County, Pennsylvania. When Reeves identified himself, Steibing started to walk towards the back door of the house. Reeves told Steibing that he had a warrant for his arrest and that Steibing should not run. Steibing continued into the residence and locked the door behind him. Falls Township Police forced entry into the house and took Steibing into custody without further incident. Steibing stated that he ran because he wanted to get his phone and that he was scared.

30. After Detective Reeves read Steibing his Miranda Warnings, Steibing agreed to speak with Reeves. In relevant part, Steibing claimed to only use two e-mail addresses, one being mrcskillz3@aol.com, and denied having had any contact with CW1 via the Internet. Steibing attempted to blame his brother for the creation of the child pornography, including the existence of what appeared to be nude images of Steibing's minor daughter, which law enforcement had located on the Internet. Reeves informed Steibing that he was lying and that he was a "pervert" with deep-seeded issues. Steibing was taken to a cell block, processed and arraigned. Afterwards, Reeves told Steibing that it was important for him to provide answers for what he had done. Steibing became flush in the face and began to cry, stating that he wanted to speak to Reeves but did not know what to do. Reeves responded that it was Steibing's right not to speak to him and that he would respect that. Steibing then said in reference to his arrest that that crack

cocaine made him “do bad things. Things that I don’t want to do.” When Reeves asked Steibing why he had targeted CW1, Steibing dropped his head and stated, “I don’t know why.” When asked if he had lied about suggesting his brother was involved in the offense, Steibing stated “Well, I did get the computer from him.” Steibing then stated that he wanted to talk to Reeves but that he first wanted to speak with someone else. Reeves discontinued further questioning at that time.

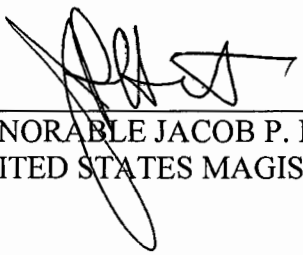
D. CONCLUSION

31. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that violations of Title 18 U.S.C. § 2251, § 2422(b) and § 2261A(2) have been committed by CHRISTOPHER STEIBING.



Michael R. Goodhue
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me
this 16 day of January, 2014:



HONORABLE JACOB P. HART
UNITED STATES MAGISTRATE JUDGE